

# **APPENDIX B**

## **Existing ROPs and PASS-ROP**



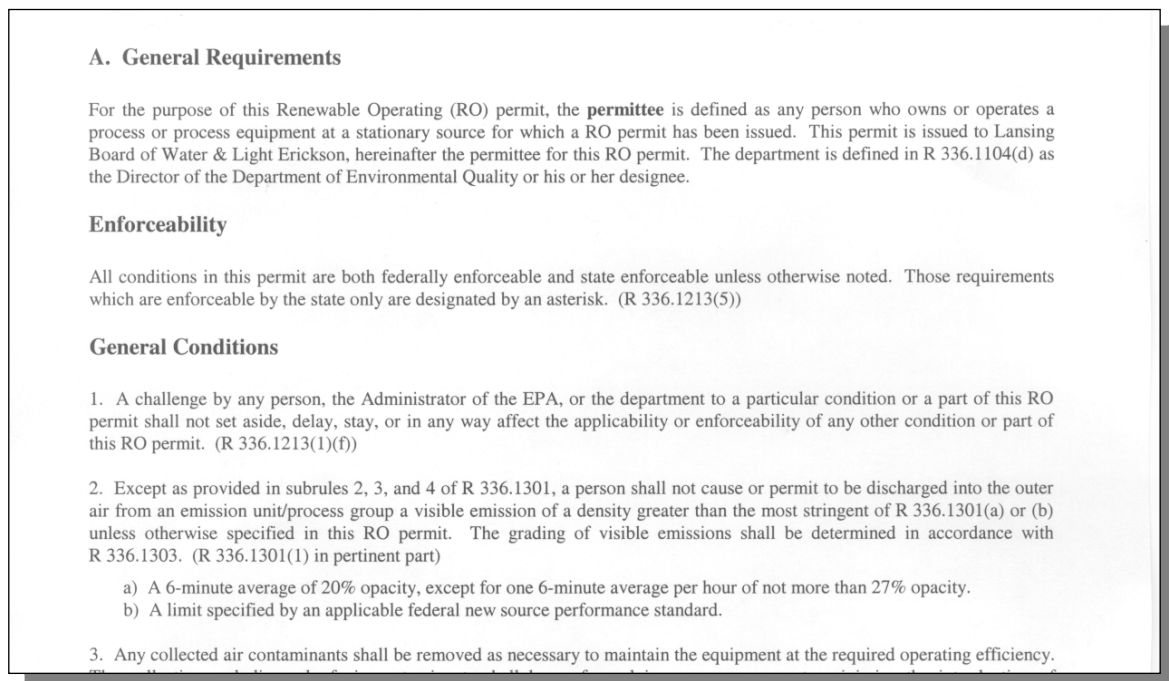
# APPENDIX B: EXISTING ROPS AND PASS-ROP

Before you begin completing your application to renew your ROP using the PASS-ROP software, it is important to know how the information required to complete your application relates to your existing sources of information. Since an ROP does not establish any new requirements, almost everything that is required in the application can be found in your existing ROP, Permits to Install (PTI), or Consent Orders/Judgments (CO/CJ). Essentially, completing your renewal application is just a data transfer and permit clean-up procedure. The guidance below will help you relate information that is already contained in your existing ROP, PTI, and CO/CJ to what is required in your renewal application.

Every ROP is divided into several parts that outline your requirements. The format of an ROP may vary slightly depending on when the ROP was issued, however, for the most part all ROPs are structured as described below.

## PART A: GENERAL REQUIREMENTS

**Part A** of your ROP identifies **General Requirements**, including general conditions (Figure B-1). These requirements apply to all ROP sources and therefore do not need to be included in your ROP renewal application.



*Figure B-1: Part A of an ROP*

## PART B: SOURCE-WIDE REQUIREMENTS

**Part B** of your ROP establishes any **Source-Wide Requirements** that your source may be subject to (Figure B-2). These are requirements that apply to the source as a whole as opposed to a particular emission unit or flexible group. All source-wide requirements should be identified on the AR forms. When entering source-wide applicable requirements on the AR-001 and AR-002 forms, the Operator's ID displayed at the top of the screen should be your SRN (Figure B-3). This associates the applicable requirement with the source, as opposed to an emission unit or flexible group.

TABLE B SOURCE-WIDE REQUIREMENTS					
<b>I. DESIGN PARAMETERS</b>					
<b>A. Pollution Control Equipment</b>		NA			
<b>B. Stack/Vent Parameters</b>		Exhaust gases shall be discharged unobstructed vertically upwards unless otherwise noted.			
Stack/Vent ID	a. Minimum Height (feet)	b. Maximum Exhaust Dimension (inches)	c. Temp. (°F)	d. Air Flow Rate (acfm)	Applicable Requirement
NA	NA	NA	NA	NA	NA
<b>C. Other Design Parameters</b>					
NA					
<b>II. MATERIAL USAGE/EMISSION LIMITS</b>					
<b>A. Material</b>		<b>Maximum Usage Rate</b>			
NA		NA			
<b>B. Pollutants</b>		<b>Maximum Emission Limit</b>			
Hazardous Air Pollutants (HAPs)		1. The stationary source-wide emission rate of a single HAP shall be less than 9.9 tons per 12-month rolling time period. (R 336.1213(1)(a))  2. The stationary source-wide emission rate of total combined HAPs shall be less than 24.9 tons per 12-month rolling time period. (R 336.1213(1)(a))			
<b>III. COMPLIANCE EVALUATION</b>					

Figure B-2: Part B of an ROP

AR-001 LIMITS AND RESTRICTIONS			
Form Type	AR-001	SRN	Z9999
Operator's EU/FG/Source ID		Z9999	Record 6 of 6
<b>APPLICABLE REQUIREMENT INFORMATION</b>			
AQD Applicable Requirement ID	Operator's Applicable Requirement ID		Form 1 of 1

For source-wide requirements, your SRN should appear here.

Figure B-3: The AR-001 Form

## PART C: EMISSION UNIT / PROCESS GROUP SUMMARY TABLE

**Part C** of your ROP identifies the emission units that are in your ROP. These emission units are made up of the different processes at your facility. An emission unit may consist of several inter-related processes or a single process. The table in Part C identifies the emission units at your facility including the Unit/Group ID, which is the ID that you will find throughout the requirement tables (Figure B-4). Each emission unit identified in this table should be included on an EU-002 or EU-003 form. The Unit/Group ID should be used as the Operator's Emission Unit ID on the EU forms to identify the emission unit (Figure B-5).

**Note:** Older ROPs will have a Unit/Group ID with an "EG" prefix; however, the "EU" prefix should be used on ROP application forms. So "EGBOILER#4" would now be identified on the EU-003 form as "EUBOILER#4."

**C. Emission Unit/Process Group Summary Table**

Unit/Group ID	Emission Unit/Process Group Description	Installation/Modification Date	Control Device Description	Stack/Vent ID	Requirement Table No.
EGCOLDCLEANERS	There are currently 5 Safety Kleen metal parts cleaners located throughout the facility. Stoddard solvent is used in all.	After 7/1/79	NA	NA	F-01.2
EGBOILER#3	The back-up boiler. Natural gas fired with #2 fuel oil as back-up. Initial rated capacity is 90,000 # steam/hr (121 MMBtu/hr).	1951 9/69	NA	SVBOIL3_STACK	F-01.1
EGBOILER#4	The primary boiler. Natural gas fired with #2 fuel oil as back-up. Initial rated capacity is 125,000 # steam/hr (169 MMBtu/hr).	2/1/70	NA	SVBOIL4_STACK	F-01.1
EGRAPERMACHINE	Takes the pulp and forms it into paperboard	1940's	DVPAPERCYCLONE1	SVPAPMACH9.1	F-01.1

Figure B-4: Part C of an ROP

**EU-003 EMISSION UNIT**

Form Type EU-003    GRN    Z9999    Emission Unit 6 of 6

**EMISSION UNIT IDENTIFICATION**

AQD Emission Unit ID    Operator's Emission Unit ID    SIC Code

EU00008    EUBOILER#4   

Operator's Emission Unit Description

The primary boiler. Natural gas fired 169 MMBtu/hr

Installation Date    Date of Last Modification/Reconstruction    Dismantle Date

MM/DD/YYYY    MM/DD/YYYY    MM/DD/YYYY

Figure B-5: The EU-003 Form

## PART D: FLEXIBLE GROUPINGS SUMMARY TABLE

**Part D** of your ROP identifies any flexible groups that have been created to simplify the permit. Flexible groups may include emission units that have identical applicable requirements for controls, monitoring, etc. Sources with flexible groups in their permit will have a table like the one shown in Figure B-6. This table provides the Flexible Group ID (e.g. FG-CLDCLNR, FG-OIL\_QUIENCHING) and lists the emission units that make up the flexible group.

If your ROP contains a flexible group it should be entered on the Flexible Group Form (FG-001) in the ROP application. The Flexible Grouping ID shown in the table in your ROP should be the operator's ID entered on the FG-001 form (Figure B-7).

**D. Flexible Groupings Summary Table**

Flexible Grouping ID	Emission Unit/Process Groups Included in Flexible Grouping	Requirement Table No.
FG-CLDCLNR	EG-CLDCLNR_1 through EG-CLDCLNR_18	F-01.1
FG OIL_QUIENCHING	EG-1-STABAR, EG-2-STABAR, EG-6SPRINGQUENCH, EG-7SPRINGQUENCH and EG QUIENCH/WASH_1-10	F-01.2

Figure B-6: Part D of an ROP

Figure B-7: The FG-001 Form

## PART E: EMISSION UNIT/PROCESS GROUP REQUIREMENTS

**Part E** of your ROP contains tables that outline the applicable requirements for each emission unit listed in the Emission Unit summary table in Part C (Figure B-4). The table is in outline format and identifies the design parameters, material usage/emission limitations, monitoring, recordkeeping, reporting, and testing requirements as well as operations parameters and any other requirements that the emission unit is subject to (Figure B-8). The requirements listed in this table are referred to as “applicable requirements” and should be entered on the AR-001 and AR-002 forms in the ROP application. The following pages explain how the requirement table in Part E is broken down and where the information should be entered on the ROP application forms.

TABLE E-1.1 EGBOILER EMISSION UNIT/PROCESS GROUPING REQUIREMENTS					
EMISSION UNIT	EGBOILER This emission unit/process group includes the boiler and the associated scrubber and baghouse				
Flexible Grouping ID	NA				
I. DESIGN PARAMETERS					
A. Pollution Control Equipment	Pulse Jet Baghouse, Dry Scrubber				
B. Stack/Vent Parameters	Exhaust gases shall be discharged unobstructed vertically upwards unless otherwise noted.				
Stack/Vent ID	a. Minimum Height (feet)	b. Maximum Exhaust Dimension (inches)	c. Temp (°F)	d. Air Flow Rate (acfm)	Applicable Requirement
SVBOILER	250	76	NA	NA	(R 336.1225*, 40 CFR, 52.21(j))
C. Other Design Parameters					
NA					
II. MATERIAL USAGE/EMISSION LIMITS					
A. Material		Maximum Usage Rate			
1. Wood and wood waste		1. The total charge rate of wood fuel in EGBOILER shall not exceed 420,000 pounds per steam generating unit operating day. (R 336.1201(3))			
2. Petroleum Coke		1. The charge rate of petroleum coke in EGBOILER shall not exceed 130,800 pounds per steam generating unit operating day. (R 336.1201(3))			
B. Pollutant		Maximum Emission Limit			
1. Particulate Matter		1. The particulate emission rate from EGBOILER shall not exceed 0.03 pound per million Btu heat input. (40 CFR 52.21(j), 40 CFR 60.42a(a)(1))  2. The particulate emission rate from EGBOILER shall not exceed 11.5 pounds per hour. (40 CFR 52.21(j))  3. Visible emissions from EGBOILER shall not exceed a 6-minute average of 10% opacity. Compliance with this limit shall be considered compliance with the following limits which have been subsumed under this streamlined requirement: R 336.1201(3), 40 CFR 52.21(j) (40 CFR 60.42a(b))			
2. Sulfur Dioxide, (SO2)		1. The SO2 emission rate from EGBOILER shall not exceed 6.45 tons per day. (40 CFR 52.21(j))  2. The SO2 emission rate from EGBOILER shall not exceed 881.9 tons per year, based on a 12 month rolling time period as determined at the end of each calendar month. (40 CFR 52.21(j))			
3. Nitrogen Oxides, (NO2)		1. The nitrogen oxides emission rate EGBOILER shall not exceed 0.60 pound per million Btu heat input, based upon a 30-day rolling average. (40 CFR 60.44a(1))  2. The NO2 emission rate from EGBOILER shall not exceed 1018 tons per year, based on a 12 month rolling time period as determined at the end of each calendar month. (40 CFR 52.21(j))			

Figure B-8: Sample ROP

## I. DESIGN PARAMETERS

I. DESIGN PARAMETERS					
A. Pollution Control Equipment		Pulse Jet Baghouse, Dry Scrubber			
B. Stack/Vent Parameters		Exhaust gases shall be discharged unobstructed vertically upwards unless otherwise noted.			
Stack/Vent ID	a. Minimum Height (feet)	b. Maximum Exhaust Dimension (inches)	c. Temp (°F)	d. Air Flow Rate (acfm)	Applicable Requirement
SVBOILER	250	76	NA	NA	(R 336.1225*, 40 CFR, 52.21(j))
C. Other Design Parameters					
NA					

UAR

Figure B-9: Design Parameters

- A. Pollution Control Equipment:** Any pollution control equipment entered in this part of the table should be identified on the EU-003 form.
- B. Stack/Vent Parameters:** If the stacks listed in this section have applicable requirements, as in the figure above, they should be identified on the EU-003 form. The stack applicable requirements should be entered on the AR-001 form. In the “Applicable Requirement Type” field select “Stack/Vent Restriction.” If there are several stacks with applicable requirements, you can enter all the applicable requirements on one AR-001 form. The requirement number would be entered as “E-1.1/I.B.”
- C. Other Design Parameters:** Any requirements listed should be entered as an applicable requirement on the AR-001 form. In the “Applicable Requirement Type” field, choose “Design/Equipment Restriction.”

**Note:** The Underlying Applicable Requirement (UAR) is the Rule that is in parenthesis after the applicable requirement (e.g. **R 336.1702(a)**). This is the number that you will enter into the UAR field on the AR-001 form.



**II. MATERIAL USAGE/EMISSION LIMITS**

<b>II. MATERIAL USAGE/EMISSION LIMITS</b>	
<b>A. Material</b>	<b>Maximum Usage Rate</b>
1. Wood and wood waste	1. The total charge rate of wood fuel in EGBOILER shall not exceed 420,000 pounds per steam generating unit operating day. <b>(R 336.1201(3))</b>
2. Petroleum Coke	1. The charge rate of petroleum coke in EGBOILER shall not exceed 130,800 pounds per steam generating unit operating day. <b>(R 336.1201(3))</b>
<b>B. Pollutant</b>	<b>Maximum Emission Limit</b>
1. Particulate Matter	1. The particulate emission rate from EGBOILER shall not exceed 0.03 pound per million Btu heat input. <b>(40 CFR 52.21(j), 40 CFR 60.42a(a)(1))</b>  2. The particulate emission rate from EGBOILER shall not exceed 11.5 pounds per hour. <b>(40 CFR 52.21(j))</b>  3. Visible emissions from EGBOILER shall not exceed a 6-minute average of 10% opacity. Compliance with this limit shall be considered compliance with the following limits which have been subsumed under this streamlined requirement: R 336.1201(3), 40 CFR 52.21(j) <b>(40 CFR 60.42a(b))</b>
2. Sulfur Dioxide, (SO <sub>2</sub> )	1. The SO <sub>2</sub> emission rate from EGBOILER shall not exceed 6.45 tons per day. <b>(40 CFR 52.21(j))</b>  2. The SO <sub>2</sub> emission rate from EGBOILER shall not exceed 881.9 tons per year, based on a 12 month rolling time period as determined at the end of each calendar month. <b>(40 CFR 52.21(j))</b>
3. Nitrogen Oxides, (NO <sub>2</sub> )	1. The nitrogen oxides emission rate EGBOILER shall not exceed 0.60 pound per million Btu heat input, based upon a 30-day rolling average. <b>(40 CFR 60.44a(1))</b>  2. The NO <sub>2</sub> emission rate from EGBOILER shall not exceed 1018 tons per year, based on a 12 month rolling time period as determined at the end of each calendar month. <b>(40 CFR 52.21(j))</b>

*Figure B-10: Material Usage Limits*

**A. Material:** Any material usage limits listed should be identified on the AR-001 form. Choose “Material Limit” in the “Applicable Requirement Type” field. The associated compliance method will be identified in the Compliance Evaluation portion of the requirement table and will be reported on the AR-002 form (e.g., monitoring/recordkeeping).

**B. Pollutant:** Any pollutant emission limits listed should be identified on the AR-001 form. Choose “Emission Limit” in the “Applicable Requirement Type” field. The associated compliance method will be identified in the Compliance Evaluation portion of the requirement table and will be reported on the AR-002 form (e.g., testing/sampling).

**Note:** If more than one material usage limit or emission limit is given as shown in Figure B-10, an AR-001 form must be completed for each limit.

**III. COMPLIANCE EVALUATION**

This part of the requirement table establishes the compliance methods used for the applicable requirements in the table (e.g., Monitoring/Recordkeeping, Testing/Sampling) (Figure B-11). The applicable requirements identified in this part will be entered on the AR-002 form.

<b>III. COMPLIANCE EVALUATION</b>	
Records of all of the following shall be maintained on file for a period of 5 years. (R 336.1213(3)(b)(ii))	
<b>A. MONITORING/RECORDKEEPING (R 336.1213(3))</b>	
<b>In Addition To General Requirements in Part A</b>	
<b>1. Continuous Emission Monitoring (CEM) System and Recordkeeping</b>	<ol style="list-style-type: none"> <li>1. The Permittee shall monitor and record the visible emissions from EGBOILER on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. Monitoring data shall be kept on file and be made available to the Air Quality Division upon request. (40 CFR 60.47a(a), (R 336.1201(3), R 336. 2101(1)(a), R 336. 1213(3))</li> <li>2. The Permittee shall monitor and record the sulfur dioxide emissions from EGBOILER on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. The sulfur dioxide emissions are to be monitored at both the inlet and the outlet of the sulfur dioxide control device. (40 CFR 60.47a(b) R 336. 2101(1)(b), R 336. 1213(3))</li> <li>3. The Permittee shall monitor and record the nitrogen oxide emissions from EGBOILER on a continuous basis in a manner and with instrumentation acceptable to the Air Quality Division. All monitoring data shall be made available to the Air Quality Division upon request. (40 CFR 60.47a(c), R 336. 2101(1)(c), R 336. 1801(7), R 336. 1213(3))</li> </ol>
<b>2. Process Monitoring System and Recordkeeping</b>	<ol style="list-style-type: none"> <li>1. The Permittee shall monitor and record the actual charge rate of wood fuel in pounds per steam generating unit operating day for EGBOILER. Permittee shall keep a record of the wood fuel charge rates on file and made available to the Air Quality Division upon request. (R 336.1201(3), R 336.1213(3))</li> <li>2. The Permittee shall calculate the actual charge rate of petroleum coke in pounds per steam generating unit operating day in EGBOILER. The Permittee shall keep a record of the data and calculations on file and made available to the Air Quality Division, upon request. (R 336.1213(3))</li> </ol> <p><b>See Appendix 7 for calculations</b></p>
<b>3. Other Monitoring and/or Recordkeeping</b>	NA
<b>B. TESTING/RECORDKEEPING (R 336.1213(3))</b>	
<b>In Addition to General Requirements in Part A</b>	
<b>1. Parameter to be Tested/Recorded</b>	1. Particulate emission rates from EGBOILER (40 CFR 60.42a, 40 CFR 60.8, R 336.1213(3))
<b>2. Method/Analysis</b>	1. Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable federal Reference Methods. (40 CFR 60.8).
<b>3. Frequency and Schedule of Testing/Recordkeeping</b>	<ol style="list-style-type: none"> <li>1. Within 60 days after achieving the maximum production rate, but not later than 180 days after the commencement of trial operation. (R 336. 2001, R 336. 2003, R 336. 2004, 40 CFR 60.8)</li> <li>2. Within 180 days before permit expiration. (R 336. 2001, R 336. 2003, R 336.2004, 40 CFR 60.8)</li> </ol>

Figure B-11: Compliance Evaluation – Monitoring/Recordkeeping

**A. MONITORING/RECORDKEEPING:** All monitoring and associated recordkeeping is identified here and will be broken down into the types identified below. For these requirements you will choose “Monitoring/Recordkeeping” as the Applicable Requirement Type on the AR-002 form.

- 1. Continuous Emission Monitoring (CEM) System and Recordkeeping:** Any CEM requirements will be listed here. The first CEM requirement in Figure B-11 would be entered on the AR-002 form as “**E-1.1/III.A.1.1.**” Complete an AR-002 form for each CEM applicable requirement.
- 2. Process Monitoring System and Recordkeeping:** Any process monitoring requirements will be included in this area of the requirement table. The first process monitoring requirement in Figure B-11 would be entered on the AR-002 form as “**E-1.1/III.A.2.1**” and the UARs entered on the AR-002 would be “**R 336.1201(3)**” and “**R 336.1213(3)**.” Process monitoring applicable requirements are usually used to demonstrate compliance with an operational restriction identified in Section V of the requirement table (see page B-12) but may also be used to demonstrate compliance with material usage and emission limitations in Section II of the requirement table.
- 3. Other Monitoring and/or Recordkeeping:** Any other monitoring or recordkeeping associated with the emission unit will be listed in this area of the requirement table. A separate AR-002 form will need to be completed for each requirement. Applicable requirements listed in this area are usually used to demonstrate compliance with a material usage or emission limit identified in Section II of the requirement table (see page B-7).

**Note:** A monitoring/recordkeeping requirement may serve as the compliance method for several applicable requirements identified in the Material Usage/Emission Limit portion of the requirement table (Figure B-12). A monitoring/recordkeeping requirement in Figure B-11 would be identified on the AR-002 form. All applicable requirements to which this monitoring serves as a compliance method would be identified at the bottom of the AR-002 form in the “Associated Applicable Requirement” field.

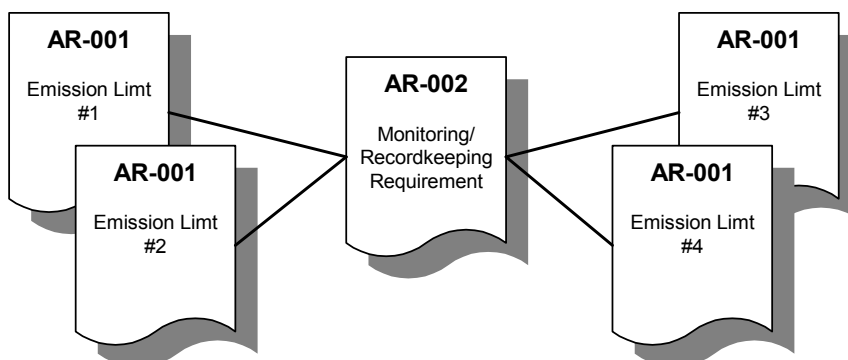


Figure B-12: AR-002 Diagram

<b>B. TESTING/RECORDKEEPING (R 336.1213(3)) In Addition to General Requirements in Part A</b>	
<b>1. Parameter to be Tested/Recorded</b>	1. Particulate emission rates from EGBOILER (40 CFR 60.42a, 40 CFR 60.8, R 336.1213(3))
<b>2. Method/Analysis</b>	1. Stack testing procedures and the location of stack testing ports shall be in accordance with the applicable federal Reference Methods. (40 CFR 60.8).
<b>3. Frequency and Schedule of Testing/Recordkeeping</b>	1. Within 60 days after achieving the maximum production rate, but not later than 180 days after the commencement of trial operation. (R 336. 2001, R 336. 2003, R 336. 2004, 40 CFR 60.8)  2. Within 180 days before permit expiration. (R 336. 2001, R 336. 2003, R 336.2004, 40 CFR 60.8)

*Figure B-13: Compliance Evaluation – Testing/Recordkeeping*

**B. TESTING/RECORDKEEPING:** All testing and associated recordkeeping requirements are provided under this heading. The requirements are broken down as illustrated in Figure B-13. For these requirements you will choose “Testing/Sampling” as the Applicable Requirement Type on the AR-002. The table in Figure B-13 breaks the testing requirement into four different applicable requirements (III.B.1.1, III.B.2.1, III.B.3.1, and III.B.3.2). An AR-002 form would have to be completed for each of these requirements.

- 1. Parameter to be Tested/Recorded:** These conditions identify the parameter that should be tested and recorded. These parameters will correspond to any material or emission limits established in the Material Usage/Emission Limit portion of the requirement table (see Figure B-10).
- 2. Method/Analysis:** These conditions explain the method used to comply with the testing requirement.
- 3. Frequency and Schedule of Testing/Recordkeeping:** These conditions establish how often the parameter must be tested to comply with the permit. .

#### IV. REPORTING

This section of the requirement table identifies any reports that must be submitted to demonstrate compliance with the other applicable requirements listed in the permit (Figure B-14). The applicable requirements identified in this portion of your permit will be entered on the AR-002 form. For these requirements you will choose “Reporting” as the Applicable Requirement Type on the AR-002 form.

The three reporting requirements identified in Figure B-14, which pertain to prompt reporting of deviations, semi-annual deviation reporting, and annual compliance certifications do **NOT** have to be included in your ROP application. These reporting requirements appear in every ROP and refer to General Requirements; therefore, it is unnecessary to include them in the application. Any other reporting requirement that appears in this section of the requirement table will have to be included in your ROP application on the AR-002 form.

IV. REPORTING	
Reports and Schedules	
<div style="border: 1px solid black; padding: 5px; width: fit-content;">           You do not need to report these requirements         </div>	1. Prompt reporting of deviations pursuant to Condition 24 of Part A. (R 336.1213(3)(c)(ii))
	2. Semiannual reporting of deviations pursuant to Condition 23 of Part A. Due March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (R 336.1213(3)(c)(i))
	3. Annual certification of compliance pursuant to Conditions 28 and 29 of Part A. Due annually by March 15 for the previous calendar year. (R 336.1213(4)(c))
	4. Quarterly reporting of excess emissions pursuant to Condition 23 of Part A. Due June 15 for reporting period January 1 to March 31, September 15 for reporting period April 1 to June 30, December 15 for reporting period July 1 to September 30, and March 15 for reporting period October 1 to December 31. (R 336.1213(3)(c)(i))
	5. No less than 60 days prior to testing, a complete stack testing plan must be submitted to the AQD District Supervisor. (R 336. 2001, R 336. 2003))
	6. Verification of particulate emission rates includes the submittal of a complete report of the test results. (R 336. 2001, R 336. 2003))
	7. Any daily usage rates that exceed the allowed charge rates specified in this permit for wood fuel or petroleum coke shall be reported to the District Supervisor, Air Quality Division, by the 30th day of the succeeding calendar month. (R 336.1213(3))

Figure B-14: Reporting

## V. OPERATIONAL PARAMETERS

This section of the requirement table identifies any operating parameters associated with the emission unit that this requirement table represents (Figure B-15). The applicable requirements identified in this part of your permit will be entered on the AR-001 form.

If the requirement is associated with a compliance method in section III of the requirement table (e.g. the requirement provides a temperature limit and there is a temperature monitoring requirement in section III), choose "Operational Restriction" as the Applicable Requirement Type on the AR-001 form. However, if the requirement is not associated with a compliance method in section III of the requirement table, choose "Other" as the Applicable Requirement Type on the AR-001 form.

Figure B-15 identifies three operational parameters; therefore, three separate AR-001 forms must be completed. The requirement number entered on the AR-001 form for the first requirement would be "E-1.1/V.1" and the UAR entered would be "R 336.1910."

V. OPERATIONAL PARAMETERS	
1.	The permittee shall not operate any spray booth unless all exhaust filters are in place and operating properly. (R 336.1910)
2.	The disposal of waste coatings, solvents, and exhaust filters shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. (R 336.1702(a))
3.	The ovens associated with the spray booths shall not cure parts at temperatures greater than 194° F. (R 336.1702(a))

*Figure B-15: Operational Parameters*

**Note:** Applicable requirements listed as operational parameters will most likely be linked to a process monitoring applicable requirement listed under section III(2) of the requirement table and identified on the AR-002 form (see Figure B-11).

## VI. OTHER REQUIREMENTS

This section of the requirement table identifies any other applicable requirements that the emission unit may be subject to (Figure B-16). The applicable requirements identified in this portion of your permit may be entered on the AR-001 **or** AR-002 form.

Many of the requirements in this section of the requirement table consist of records maintenance activities (i.e. keeping certain documents or records on file as in Figure B-16). Enter these applicable requirements on the **AR-002** form and choose “Records Maintenance Requirements” as the Applicable Requirement Type. Records maintenance requirements are necessary to track compliance with material usage/emission limits, which are listed under section II of the requirement table and identified on the AR-001 form (see Figure B-16). You will need to link the records maintenance requirement with the appropriate associated material usage/emission limit(s) at the bottom of the AR-0002 form in the “Associated Applicable Requirements” field.

Most of the other requirements listed in this section are here because they do not fit elsewhere in the requirement table (e.g., *The Permittee Shall comply with the malfunction abatement plan.*). These requirements should be entered on the **AR-001** form by choosing “Other” as the Applicable Requirement Type.

VI. OTHER REQUIREMENTS
The permittee shall maintain a current listing of the manufacturer’s formulation data for each coating, reducer, and cleanup solvent, etc., used in the paint booths. This shall include, at a minimum, the chemical composition and weight percent of each component. (R 336.1201(3))

Figure B-16: Other Requirements

The requirement in Figure B-16 would be entered on an AR-002 form. “Records Maintenance” would be selected as the Applicable Requirement Type. The requirement number entered on the AR-002 form would be “**E-1.1/VI**” and the UAR entered would be “**R 336.1201(3)**.”

## PART F: FLEXIBLE GROUP REPORTING REQUIREMENTS

**Part F** of your ROP contains tables that outline the applicable requirements for each flexible group listed in the flexible group summary table in Part D (see Figure B-6). This table is organized exactly like the emission unit requirement table in Part E of the ROP except instead of establishing the applicable requirements for an emission unit, this table establishes the applicable requirements for a group of emission units. The table identifies the design parameters, material usage/emission limitations, monitoring, recordkeeping, reporting, and testing requirements as well as operations parameters and any other requirements that the flexible group is subject to. As with the Emission Unit Requirement Table, the requirements listed in this table will be entered on the AR-001 and AR-002 forms in the ROP application. However, instead of identifying the requirements at the emission unit level the applicable requirements are listed for the entire flexible group. For guidance on how this section of your permit relates to the ROP application forms, refer to the Part E discussion on pages B-5 through B-13.

**TABLE F-1.1 FGCOATINGPROCESS  
FLEXIBLE GROUPING REQUIREMENTS**

FLEXIBLE GROUPING		FGCOATINGPROCESS - Miscellaneous Metal Parts Coating Process and solvent cleanup.			
Emission Unit/Process Groups		EGPAINT-BOOTH1, EGPAINT-BOOTH2, EGPAINT-BOOTH3, EGPAINT-BOOTH4, EGPAINT-BOOTH5, EGDIP-TANK			
I. DESIGN PARAMETERS					
Pollution Control Equipment		Booths 1-5 controlled by dry filters and waterwash system.			
Stack/Vent Parameters		Exhaust gases shall be discharged unobstructed vertically upwards unless otherwise noted.			
Stack/Vent ID	Minimum Height (feet)	Maximum Exhaust Dimension (feet)	Temperature (°F)	Air Flow Rate (acfm)	Applicable Requirement
SVSTACK1	47.0	3.5	NA	NA	R 336.1230*
SVSTACK2	47.0	3.5	NA	NA	R 336.1230*
SVSTACK3	47.0	3.5	NA	NA	R 336.1230*
SVSTACK4	47.0	3.5	NA	NA	R 336.1230*
SVSTACK5	47.0	3.5	NA	NA	R 336.1230*
Other Design Parameters:					
NA					
II. MATERIAL USAGE/EMISSION LIMITS					
Material		Maximum Usage Rate/Applicable Requirement			
NA		NA			
Pollutants		Maximum Emission Limit/Applicable Requirement			
VOCs		1. The total combined VOC emission rate from the coating processes, shall not exceed 59.7 pounds per hour, nor 89.4 tons per year based on a 12 month rolling time period, as determined at the end of each calendar month.  <div>(R 336.1230)*</div> 2. The VOC content of each coating used in the coating process, shall not exceed a volume weighted average of 3.5 pounds per gallon (minus water) as applied, as determined on a calendar day averaging period, except as specified in Rule 621.  <div>(R 336.1702(d))</div>			
Acetone		1. The Acetone emission rate from the coating processes, shall not exceed 6.9 pounds per hour, nor 4.6 tons per year based on a 12 month rolling time period, as determined at the end of each calendar month.  <div>(R 336.1230)*</div>			
III. COMPLIANCE EVALUATION					
Records of all of the following shall be maintained on file for a period of 5 years pursuant to R 336.1213(3)(b)(ii)					
MONITORING/RECORDKEEPING					
In Addition to General Requirements in Part A					
Continuous Emission Monitoring (CEM) System and Recordkeeping		NA			
Process Monitoring System and Recordkeeping		NA			
Other Monitoring and/or Recordkeeping		1. The Permittee shall keep separate monthly usage records of each coating and solvent used in the Coating Process. See Appendix 4. <div>(R 336.1213(3)(b))</div> 2. On a monthly basis, the Permittee shall calculate and record the hourly and monthly VOC and Acetone emission rates in pounds per hour and tons per month respectively. See Appendices 4 and 7. <div>(R 336.1213(3)(b))</div>			

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Figure B-17: Flexible Group Requirement Table



## PASS-ROP AND PERMITS TO INSTALL

If you have requirements in a Permit to Install (PTI), and they have **not** yet been incorporated into your ROP, you must enter these requirements in your ROP application. As with your issued ROP, you can use your issued PTI to complete the necessary ROP application forms. *If this is an initial ROP application all your applicable requirements will be contained in PTIs.*

Your PTI should identify the emission unit(s) it represents, including an Emission Unit ID. These will be at the beginning of the special conditions section of the PTI. Enter this information on the EU-002 or EU-003 form as explained in Chapter 6 of the workbook.

All applicable requirements associated with the emission unit(s) will be in the special conditions of the PTI (Figure B-18). General Conditions do not have to be identified in the ROP application. Each special condition is considered an applicable requirement and will need to be entered onto either the appropriate AR-001 or AR-002 forms. If the condition is a limit/restriction applicable requirement (i.e., emission limit, material limit, visible emission limit, operational restriction, design/equipment restrictions, or stack/vent restrictions), include it on an AR-001 form. If the special condition is a compliance method (i.e., monitoring/recordkeeping, testing/sampling, reporting, and records maintenance), include it on an AR-002 form.

### Process/Operational Limits

- 1.5 The total hours for startup and shutdown for FG-TURBINES shall not exceed 500 hours per turbine per 12-month rolling time period as determined at the end of each calendar month. Startup is defined as the period of time from initiation of combustion firing until the unit reaches steady state operation (i.e., loads greater than 50 percent). Shutdown is defined as that period of time from the initial lowering of the turbine output, with the intent to shut down, until the point at which the combustion process has stopped. [40 CFR 52.21 (j)]
- 1.6 The permittee shall not operate FG-TURBINES unless all applicable provisions of the federal PSD regulations, 40 CFR 52.21, are met. This permit is issued pursuant to the determination that FG-TURBINES can comply with all applicable requirements under these regulations. [40 CFR 52.21]
- 1.7 The permittee shall comply with all provisions of the federal Standards of Performance for New Stationary Sources as specified in 40 CFR Part 60, Subparts A and GG, as they apply to FG-TURBINES. [40 CFR Part 60, Subparts A and GG]
- 1.8 The permittee shall comply with all of the applicable requirements contained in the federal Acid Rain Program, as it applies to FG-TURBINES. [Title IV of the federal Clean Air Act of 1990]
- 1.9 The permittee shall not operate FG-TURBINES unless the AQD District Supervisor has approved a plan that describes how emissions will be minimized during startup(s), shutdown(s) and malfunction(s). The plan shall incorporate procedures recommended by the equipment manufacturer as well as incorporating standard industry practices. Unless notified by the District Supervisor within 30 business days after plan submittal, the plan shall be deemed approved. [R336.1911, R336.1912, 40 CFR 52.21 (j)]

### Equipment

- 1.10 The permittee shall equip and maintain each turbine included in FG-TURBINES with a dry low-NOx combustor. [R336.1205 (1)(a) and (b), R336.1910, 40 CFR 52.21 (j)]

### Testing

- 1.11 Within 180 days after commencement of trial operation, verification of CO, VOC and PM-10 emission rates from each turbine included in FG-TURBINES, by testing at owner's expense, in accordance with

Figure B-18: Special Condition in a Permit to Install

